# Delaware Division of Air Quality

2013 - 2017

Air Toxics Strategic Plan

### Delaware Division of Air Quality 2013 – 2017 Air Toxics Strategic Plan

The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by the Division of Air Quality and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics. The 2013 - 2017 ATSP, finalized on December 31, 2012, is organized within the following strategic components.

- Implement an on-going program to address the risks from exposure to air toxics
- Build a greater understanding of ambient air toxics environment
- Identify potential harm from exposure to air toxics
- Gather information related to air toxics sources
- Identify options for reducing air toxics in the environment
- Implement appropriate actions to reduce the harm from exposure to air toxics
- Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics
- Enhance DAQ air toxics resources

## 2013

#### **Year 2013**

#### Implement an on-going program to address the risks from exposure to air toxic

- 1. Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
  - a. Review status and complete year-end status report on the 2012 individual Strategic Plans by 1/31/14.
  - b. Track implementation and report year-end-status of the 2012 Air Toxics Strategic Plan by 3/31/13.
  - c. Review status and complete mid-year status report on the 2012 individual Strategic Plans by 7/31/14.
  - d. Track implementation and report mid-year status on the 2013 Air Toxics Strategic Plan by 9/30/13.
  - e. Continue to conduct GAP analyses within the risk-based strategic planning process and incorporate the results into the development of the 2014 Air Toxics Strategic Plan by 10/31/13.
  - f. Updating of the Air Toxics Strategic Plan for 2014-2018.
    - i. Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/13.
    - ii. Review and revise, if needed, air toxics area source activities and timing as part of the 2014 Air Toxics Strategic Plan by 11/13.
    - iii. Coordinate development of the 2014 Air Toxics Strategic Plan.
    - iv. Update individual Strategic Plans for 2014-2018 by 11/31/13.
    - v. Update and finalize 2014 Air Toxics Strategic Plan for years 2014 to 2018 by 12/31/13.
- 2. Build infrastructure to implement DAQ's risk-based process to mitigate unacceptable air toxics impacts.
- a. Continue the development and implementation of mobile monitoring capability.
  - i. Confirm type of mobile monitoring platform to be used by 1Q/13.
  - ii. Complete acquisition of monitoring equipment and supporting fixtures by 2Q/13.
  - iii. Complete installation and testing of the monitoring equipment and supporting fixtures by 3Q/13.
  - iv. Mobile monitoring capability available for use by 4Q/13.
  - b. Develop screening models to assess the impact from the exposure to air toxics.
    - i. Identify and characterize options for screening models to define risk from exposure to air toxics by 6/13.
    - ii. Begin testing the risk screening models using CATS monitoring results by 9/13.

#### **Year 2013**

#### Build greater understanding of ambient air toxics environment

- 1. Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - c. Continue to collaborate with University of Delaware on air toxics research and special projects.
  - d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - e. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
  - f. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
  - g. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.

#### **Year 2013**

#### Build greater understanding of ambient air toxics environment

- . Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - h. Undertake new or special monitoring needs that may surface.
    - i. Continue the special air toxic monitoring project at Martin Luther King and Delaware City air toxics monitoring stations.
    - ii. Undertake the methyl bromide monitoring project in the communities around Port of Wilmington.
    - iii. Undertake air toxics monitoring projects using the mobile monitoring platform where modeling results predict high concentrations or where the public has expressed concern.
- 2. Provide air toxics modeling support to meet community and internal needs.
- 3. Conduct "remote sensing" study to meet ozone State Implementation Plan requirements.

#### **Year 2013**

#### Identify potential harm from exposure to air toxics

- 1. Identify the potential for unacceptable air toxics impacts.
  - a. Using existing modeled results, identify candidate locations for air toxics monitoring using the mobile monitoring platform.
  - b. Continue to provide historical and projected emissions information in support of DAQ's air toxics modeling activities to identify unacceptable air toxics impacts.
  - c. Continue to perform screen modeling to address potential air toxics risks during the permitting of new or modified stationary sources.
  - d. Coordinate DPH risk assessment support when DAQ's risk-based process activities identify potentially unacceptable air toxics impacts.
- 2. Provide modeling support to DAQ's Community Air Toxics Study (CATS), when validated monitoring data becomes available.
- 3. Provide modeling support to DAQ's MLK/DC Air Toxics Project, when validated monitoring data becomes available.
- 4. Provide modeling support to Engineering & Compliance (E&C) associated with risk-based permitting decisions, as needed.

#### **Year 2013**

#### Gather information related to air toxics sources

- 1. Continue to provide emissions inventory support to the air toxics education and reduction programs, as required.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By 12/13, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
- 4. By 12/13, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
- 5. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2013.
- 6. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

#### **Year 2013**

#### Identify options for reducing air toxics in the environment

- 1. Implement a risk-based process that identifies, assesses and mitigates unacceptable air toxics impacts.
  - a. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.
- 2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
- 3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to greenhouse gases, develop strategies, and identify DE solutions.
- 4. Continue working with the Transportation & Climate Initiative (TCI) to identify other Delaware appropriate options to reduce greenhouse gases and air toxics from the transportation sector.
- 5. Participate on the OTC Mobile Source Committees developing the following model rules:
  - a. Aftermarket catalytic converters. (To be determined)
  - b. Medium and heavy-duty diesel inspection and maintenance (I/M) programs. (To be determined)
- 6. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
  - b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
- 7. Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
- 8. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- 9. Explore the feasibility of replacing the "parking lot" surveillance element of the inspection and maintenance (I/M) program with more resource-effective alternative procedures.
- 10. Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 11. Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 12. Identify grant and funding opportunities.
  - a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - b. Identify funding to implement the 2012 selected Delaware appropriate transportation sector option(s). (To be determined)
- 13. Reevaluate the "Smoking Vehicle Reduction Program" options.
  - a. Complete baseline testing of smoking vehicles program.
  - b. Review baseline testing results and identify funding of program, if implementation is warranted.
- 14. Develop and implement Stage II decommissioning strategy for gasoline dispensing facilities.
- 15. Provide technical assistance on lightering operations to DAQ and Ozone Transport Commission, as needed.

#### **Year 2013**

#### Implement appropriate actions to reduce the harm from exposure to air toxics Promote the implementation of mobile source diesel emission reduction projects. Facilitate the implementation of diesel emission reduction projects. Expand the use of auxiliary power sources for Trinity Trucking, if funding can be found. ii. Investigate other diesel emission reduction opportunities at the Port of Wilmington. Implement projects to reduce greenhouse gases and air toxics from the transportation sector. i. For at least 1 of the Delaware appropriate transportation sector options identified in 2012, establish a path forward, if resources can be identified. (To be determined) Continue to support of the SmartWay Transport programs. i. Continue to monitor usage of kiosk service systems at diesel truck electrification sites. ii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate. Insure continued or improved compliance of stationary sources. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed. Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address riskbased air toxics programs, as needed. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the 2012-13 Compliance Monitoring Plan. Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows: The 3 chrome plating facilities, subject to Reg. 1138 Section 6, covered during the 2012-13 timeframe. The 1 halogenated solvent degreaser, subject to Reg. 1138 Section 8, covered during the 2012-13 timeframe. The 2 hospital ethylene oxide sterilization facilities, subject to Reg. 1138 Section 9, covered during the 2012-13 iii. timeframe. The 1 lead acid battery manufacturing plant, subject to Reg. 1138 Section 11, covered during the 2012-13 timeframe. The 1 source, subject to electric arc furnace standard (Federal Sub YYYYY), covered during the 2012-13 timeframe. The 2 plating and polishing operations, subject to Reg. 1138 Section 10, covered during the 2012-13 timeframe. 40% or ~10 miscellaneous parts and products surface coating facilities, subject to Reg. 1138 Section 14, covered during the 2012-13 timeframe; total potential population is ~25 facilities. viii. The 1 secondary aluminum production operation, subject to Reg. 1138 Section 12, covered during the 2012-13 timeframe. ix. The 2 prepared feed manufacturing facilities, subject to Reg. 1138 Section 17, covered during the 2012-13 timeframe. By 9/13, perform compliance evaluations (CE) at area air toxics sources as follows: i. 50% or ~36 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~72 facilities. ii. 50% or ~78 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~157 facilities. 10% or ~60 gasoline delivery vessels; total population is ~600 facilities. Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124. Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during

2013; total population is ~348 facilities.

#### **Year 2013**

	In	plement appropriate actions to reduce the harm from exposure to air toxics	
2.	. Insure continued or improved compliance of stationary sources.		
	h. Co	ntinue to implement the Asbestos Demolition/Renovation Program.	
	i.	Perform site inspections at asbestos demolition/renovation sites.	
	ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).	
	iii.	Educate the public, certified contractors, professional service firms, and government agencies on the proper removal and disposal of asbestos.	
	iv.	Respond to incidences of improper disposal of asbestos containing wastes.	
	i. Ta	ke enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.	
	j. Inc	corporate updated MACT and Residual Risk requirements in air permits.	
	i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.	
		1. Camdel Metals to include halogenated solvent cleaning system residual risk requirements in Reg. 1138 Section 8.	
	ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation 1130, as needed.	
	k. Inc	corporate area source standard requirements into natural and synthetic minor source permits, including	
	i.	All new installations that are subject to area source standards in Reg. 1138.	
	ii.	All existing miscellaneous parts and products manufacturing facilities determined to be subject to the paint stripping requirements in Reg. 1138 Section 13 and/or the surface coating requirements in Reg. 1138 Section 14.	
	iii.	Johnson Controls to include lead acid battery manufacturing plant requirements in Reg. 1138 Section 11 by 6/13.	
	iv.	St. Francis Hospital to include hospital ethylene oxide sterilizer requirements in Reg. 1138 Section 9 by 6/13.	
	V.	IKO to include asphalt processing and asphalt roofing products manufacturing operations requirements in Reg. 1138 Section 16 by 12/13.	
	vi.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
	vii.	Unpermitted existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
	viii.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	
	ix.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	
	l. Re	view and approve Stage I and Stage II permit applications at gasoline dispensing facilities.	
	m. Co	ntinue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for	
	i.	Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	
	ii.	Sources subject to the Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
3.	Implen	nent control measures to mitigate unacceptable air toxics impacts, if identified.	
	ide un	DAQ identifies a local area or condition that results in unacceptable risk that is specific to a stationary source or sources, entify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the acceptable risk.	
	ide un	DAQ identifies a local area or condition that results in unacceptable risk that is specific to an area source or sources, entify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the acceptable risk.	
	act	DAQ identifies a local area or condition that results in unacceptable risk that needs to be addressed through a regulatory ion, identify and convene the appropriate stakeholders to develop an appropriate regulatory path forward to address the acceptable risk.	
	d. Co	ntinue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.	

Y	ear	2013
		Implement appropriate actions to reduce the harm from exposure to air toxics
4.	Imp	plement other air toxics-related communications and outreach programs
	a.	Continue to implement a diesel anti-idling educational program.
		i. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
		ii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
	b.	Actively promote the development and implementation of educational programs.
		i. Continue working with the DVRPC on educational programs for Air Quality Partnership (AQP).
		ii. Continue working with EPA Region 3 on educational programs for SmartWay Transport Programs.
		iii. Provide guidance and assistance to DAQ's programs on development and implementation of educational and outreach programs, when needed.
	с.	Review existing educational information on mobile source emission/impacts and develop a communication plan to address the key issues for Delaware.
	d.	Continue to participate in Claymont Coalition meetings.
	e.	Continue to improve compliance with Delaware's open burning requirements.
		i. Continue to educate the public on Delaware's open burning restrictions.
		ii. Continue to provide non-compliance prevention guidance for open burning activities.
		iii. Approve, if appropriate, notifications submitted for open burning.
	f.	Modify the Area Source outreach/communication programs to incorporate needed changes or additions.
5.	Co	ntinue to enhance the value and use of the air toxics information on DAQ's web sites.
	a. 	Continue to provide pertinent and timely information to the public and regulated community on DAQ's web site during the adoption of new air toxics standards.
	b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
	c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.	
	a.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/13, if required.
	b.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
	c.	Update the Area Source Program – Implementation Plan by 10/13, if needed.
7.	Ad	opt new and amend existing air toxics regulations for mobile and stationary sources.
	a.	Amend Regulation 1147 to include petroleum refineries.
		i. Complete promulgation by 2Q/13.
	b.	Amend Regulation 1140 to include Cal-LEV III requirements.
		i. Submit start action notice by 1Q/13.
		ii. Complete promulgation by 4Q/13.
	с.	Amend Regulation 1145 or adopt a new regulation to reduce excessive idling of non-road vehicles similar to the recently approved OTC model rule.
		i. Submit start action notice by 4Q/13.
		ii. Complete promulgation by 4Q/13.

i. Submit delegation package by 1Q/13.

Adopt area standard applicable to Prepared Feeds Manufacturing (Federal Sub DDDDDDD).

#### **Year 2013**

<u>Ye</u>	ar	<u>2013</u>	
		Implement appropriate actions to reduce the harm from exposure to air toxics	
7.	Ado	pt new and amend existing air toxics regulations for mobile and stationary sources.	
	e.	Amend area standard applicable to Plating and Polishing Operation (Section 10.0) consistent with 2011 revisions to the federal rule (Federal Sub WWWWW).	
		i. Complete final stringency determinations by 3Q/13.	
		ii. Finalize the adoption by 4Q/13.	
		iii. Publish final compliance assistance tools 4Q/13.	
		iv. Submit delegation package addendum by 4Q/13.	
	f.	Adopt RTR standards applicable to Chromium Electroplating and Anodizing Operations (Section 6.0) consistent with 2012 revisions to the federal rule (Federal Sub N).	
		i. Complete final stringency determinations by 3Q/13.	
		ii. Finalize the adoption by 4Q/13.	
		iii. Publish final compliance assistance tools 4Q/13.	
		iv. Submit delegation package addendum by 4Q/13.	
	g.	Adopt area standard applicable to Gasoline Distribution facilities (Federal Sub BBBBB).	
		<ol> <li>Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware Regulation 1124 and finalize regulatory path forward in terms of subdividing types of facilities and applicable Regulation (1124 vs. 1138) by 3Q/13.</li> </ol>	
		ii. Submit Start Action Notice(s) by 3Q/13.	
	h.	Continue to develop an initial stringency determination between revised Federal General Provisions (Federal Sub A) vs. existing Delaware Section 3 of Regulation 1138.	
	i.	Reevaluate and develop path forward for amending Regulation 1131, which would expand the low enhanced inspection and maintenance (I/M) program statewide. (Postell/Wheeler/Gray)	
	j.	Revise existing and develop new control strategies, as needed.	
		i. Develop path forward for applicable area source air toxics and incinerator standards finalized in 2013.	
		1. Area source Stationary Internal Combustion Engine Standard (Federal Sub ZZZZ).	
		2. Area source Industrial, Commercial & Institutional Boiler MACT Standard (Federal Sub JJJJJJ).	
		3. Area source Chemical Manufacturing Standard (Federal VVVVV).	
		4. Commercial and Industrial Solid Waste Incinerator Standard (Federal Sub CCCC).	
		ii. Develop path forward for residual risk standards applicable area sources finalized in 2013.	
		1. Secondary Aluminum Production Standard (Federal Sub RRR).	
8.	Con	tinue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.	
9.	Eva	luate compliance to motor vehicle registration denials resulting from failed emissions tests (i.e. "parking lot" surveillance).	
10.	Con	tinue to improve the inspection and maintenance (I/M) program reporting process.	
11.	Ider	tify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.	
12.	Con	tinue to provide air toxics-related support to State through	
	a.	Reviewing of air permits.	
	b. Providing current regulatory interpretations.		
	c.	Advising on likely future trends and actions.	

d. Providing technical support, as needed.

#### **Year 2013**

### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

- 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

#### **Year 2013**

#### Air toxics resource development

- 1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Evaluate the need for air toxics-related training for staff and present, as needed. Evaluate the need for air toxics-related training for staff and present, as needed.
- 2. Improve staff's ability to identify affected area sources by providing training on applicability requirements for air toxics area source standards adopted under 112(k).
  - a. Develop an air toxics educational program (presentation and educational materials) that facilitates the interpretation of the applicability requirements of area source standards adopted by EPA under Section 112(k).
  - b. Refine and present the training module on Section 14 of Regulation 1138 (spray-applied coating of misc. parts & products) for the Engineering and Compliance Branch.
- 3. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
- 4. Continue to build a volunteer base in DAQ.
- 5. Continue to implement newly found mechanisms to improve air toxics communications between branches.

## 2014

#### **Year 2014**

#### Implement an on-going program to address the risks from exposure to air toxic

- . Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
  - a. Review status and complete year-end status report on the 2012 individual Strategic Plans.
  - b. Track implementation and report year-end-status of the 2013 Air Toxics Strategic Plan.
  - c. Review status and complete mid-year status report on the 2013 individual Strategic Plans.
  - d. Track implementation and report mid-year status on the 2014 Air Toxics Strategic Plan.
  - e. Continue to conduct GAP analyses within the risk-based strategic planning process and incorporate the results into the development of the 2015 Air Toxics Strategic Plan.
  - f. Updating of the Air Toxics Strategic Plan for 2015-2019
    - i. Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/13.
    - ii. Review and revise, if needed, air toxics area source activities and timing as part of the 2015 Air Toxics Strategic Plan by 11/14.
    - iii. Coordinate development of the 2015 Air Toxics Strategic Plan.
    - iv. Update individual Strategic Plans for 2014-2018.
    - v. Update and finalize 2015 Air Toxics Strategic Plan for years 2015 to 2019.
- 2. Build infrastructure to implement DAQ's risk-based process to mitigate unacceptable air toxics impacts.
  - a. Develop screening models to assess the impact from the exposure to air toxics.
    - i. Test screening models to define the risk from exposure to air toxics.
    - ii. Complete the comparison of results, select preferred screen model, and provide input data protocols for future screening projects.

#### **Year 2014**

#### Build greater understanding of ambient air toxics environment

- 1. Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - c. Continue to collaborate with University of Delaware on air toxics research and special projects.
  - d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - e. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
  - f. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
  - g. Undertake new or special monitoring needs that may surface.
    - i. Undertake air toxics monitoring projects using the mobile monitoring platform where modeling results predict high concentrations or where the public has expressed concern.
- 2. Provide air toxics modeling support to meet community and internal needs.

#### **Year 2014**

#### **Identify potential harm from exposure to air toxics**

- 1. Identify the potential for unacceptable air toxics impacts.
  - a. Continue to provide modeling support to assist the DAQ's risk-based process identify unacceptable air toxics impacts.
    - i. Provide screen modeled risk results as needed.
    - ii. Using existing modeled results, identify candidate locations for air toxics monitoring using the mobile monitoring platform.
  - b. Continue to perform screen modeling to address potential air toxics risks during the permitting of new or modified stationary sources.
  - c. Coordinate DPH risk assessment support when DAQ's risk-based process activities identify potentially unacceptable air toxics impacts.
- Continue to provide historical and projected emissions information in support of DAQ's air toxics modeling activities to identify unacceptable air toxics impacts.
- 3. Continue to provide modeling support to DAQ's Community Air Toxics Study (CATS), when validated monitoring data becomes available.
- 4. Continue to provide modeling support to DAQ's MLK/DC Air Toxics Project.
- 5. Provide modeling support to Engineering & Compliance (E&C) associated with risk-based permitting decisions, as needed.

#### Year 2014

#### Gather information related to air toxics sources

- 1. Develop emissions inventory protocol for the implementation of the 2014 NEI, if needed.
- 2. Continue to provide emissions inventory support to the air toxics education and reduction programs, as required.
- 3. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 4. By 12/14, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
- 5. By 12/14, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
- 6. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2014.
- 7. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

#### **Year 2014**

#### Identify options for reducing air toxics in the environment

- 1. Implement a risk-based process that identifies, assesses and mitigates unacceptable air toxics impacts.
  - a. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.
- 2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
- 3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to greenhouse gases, develop strategies, and identify DE solutions.
- 4. Continue working with the Transportation & Climate Initiative (TCI) to identify other Delaware appropriate options to reduce greenhouse gases and air toxics from the transportation sector.
- 5. Continue to participate on the OTC Mobile Source Committees developing the following model rules:
  - a. Aftermarket catalytic converters. (To be determined)
  - b. Medium and heavy-duty diesel inspection and maintenance (I/M) programs. (To be determined)
- 6. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
  - b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
- 7. Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
- 8. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- 9. Test the resource-effective alternative procedures, if found to be feasibility, to determine the acceptability as a replacement for the current "parking lot" surveillance element of the inspection and maintenance (I/M) program.
- 10. Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 11. Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 12. Identify grant and funding opportunities.
  - a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - b. Identify funding to implement the 2013 selected Delaware appropriate transportation sector option(s). (To be determined)
- 13. Develop and implement Stage II decommissioning strategy for gasoline dispensing facilities.
- 14. Provide technical assistance on lightering operations to DAQ, as needed.

#### Year 2014

Y	<u>ear 2014</u>
	Implement appropriate actions to reduce the harm from exposure to air toxics
1.	Promote the implementation of mobile source diesel emission reduction projects.
	a. Facilitate the implementation of diesel emission reduction projects.
	b. Implement projects to reduce greenhouse gases and air toxics from the transportation sector.
	i. Facilitate the implementation of the 2012 selected Delaware appropriate transportation sector option(s), if resources can be identified. (To be determined)
	<ul> <li>For at least 1 of the Delaware appropriate transportation sector options identified in 2013, establish a path forward, if resources can be identified. (To be determined)</li> </ul>
	c. Establish the "Smoking Vehicle Reduction Program", if implementation is warranted and funding obtained.
	d. Continue to support of the SmartWay Transport programs.
	i. Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
	ii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
2.	Insure continued or improved compliance of stationary sources.
	a. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
	<ul> <li>Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk- based air toxics programs, as needed.</li> </ul>
	c. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the 2014-15 Compliance Monitoring Plan.
	d. Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
	i. The 3 chrome plating facilities, subject to Reg. 1138 Section 6, covered during the 2014-15 timeframe.
	ii. The 1 halogenated solvent degreaser, subject to Reg. 1138 Section 8, covered during the 2014-15 timeframe.
	iii. The 1 hazardous waste combustor, subject to Federal Sub EEE, covered during the 2014-15 timeframe.
	iv. The 3 municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2014-15 timeframe.
	<ul> <li>The 2 hospital ethylene oxide sterilization facilities, subject to Reg. 1138 Section 9, covered during the 2014-15 timeframe.</li> </ul>
	vi. The 1 lead acid battery manufacturing plant, subject to Reg. 1138 Section 11, covered during the 2014-15 timeframe.
	vii. The 1 source, subject to electric arc furnace standard (Federal Sub YYYYY), covered during the 2014-15 timeframe.
	viii. The 2 plating and polishing operations, subject to Reg. 1138 Section 10, covered during the 2014-15 timeframe.
	<ul> <li>ix. 40% or ~10 miscellaneous parts and products surface coating facilities, subject to Reg. 1138 Section 14, covered during the 2014-15 timeframe; total potential population is ~25 facilities.</li> </ul>
	x. The 1 asphalt processing and asphalt roofing products manufacturing operation, subject to Reg. 1138 Section 16, covered during the 2014-15 timeframe.
	xi. The 1 secondary aluminum production operation, subject to Reg. 1138 Section 12, covered during the 2014-15 timeframe.
	xii. The 1 gasoline distribution operation, subject to Federal Sub BBBBB, covered during the 2014-15 timeframe.
	xiii. The 1 chemical manufacturing operation, subject to Federal Sub VVVVV, covered during the 2014-15 timeframe.
	xiv. The 4 prepared feed manufacturing facilities, subject to Reg. 1138 Section 17, covered during the 2014-15 timeframe.
	e. By 9/14, perform compliance evaluations (CE) at area air toxics sources as follows:
	i. 50% or ~36 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~72 facilities.
	<ol> <li>50% or ~78 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~157 facilities.</li> </ol>

iii. 10% or ~60 gasoline delivery vessels; total population is ~600 facilities.

#### **Year 2014**

	In	plement appropriate actions to reduce the harm from exposure to air toxics
2.	Insure c	ontinued or improved compliance of stationary sources.
		ick annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing uirements of Regulation 1124.
		nduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 14; total population is ~348 facilities.
	h. Co	ntinue to implement the Asbestos Demolition/Renovation Program.
	i.	Perform site inspections at asbestos demolition/renovation sites.
	ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
	iii.	Educate the public, certified contractors, professional service firms, and government agencies on the proper removal and disposal of asbestos.
	iv.	Respond to incidences of improper disposal of asbestos containing wastes.
	i. Ta	ke enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.
	j. Inc	orporate updated MACT and Residual Risk requirements in air permits.
	i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
	ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation 1130, as needed.
	k. Inc	orporate area source standard requirements into natural and synthetic minor source permits, including
	i.	All new installations that are subject to area source standards in Reg. 1138.
	ii.	All existing miscellaneous parts and products manufacturing facilities determined to be subject to the paint stripping requirements in Reg. 1138 Section 13 and/or the surface coating requirements in Reg. 1138 Section 14.
	iii.	All existing prepared feed manufacturing facilities subject to requirements of Reg. 1138 Section 17 by 12/14.
	iv.	Standard Engineering to include the residual risk requirements of the chromium electroplating standard in Reg. 1138 Section 6 and the plating and polishing operations requirements in Reg. 1138 Section 10 by 12/14.
	v.	Industraplate to include plating and polishing operations requirements in Reg. 1138 Section 10 by 12/14.
	vi.	Procino Plating to include the residual risk requirements of the chromium electroplating standard in Reg. 1138 Section 6 by 12/14.
	vii.	Chrome Deposit to include the residual risk requirements of the chromium electroplating standard in Reg. 1138 Section 6 by 12/14.
	viii.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
	ix.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
	х.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
	xi.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
	1. Re	riew and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
	m. Co	ntinue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for
	i.	Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
	ii.	Sources subject to the Perchloroethylene Dry Cleaning standard (1138 Sect 5).

#### **Year 2014**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 3. Implement control measures to mitigate unacceptable air toxics impacts, if identified.
  - a. If DAQ identifies a local area or condition that results in unacceptable risk that is specific to a stationary source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.
  - b. If DAQ identifies a local area or condition that results in unacceptable risk that is specific to an area source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.
  - c. If DAQ identifies a local area or condition that results in unacceptable risk that needs to be addressed through a regulatory action, identify and convene the appropriate stakeholders to develop an appropriate regulatory path forward to address the unacceptable risk.
  - d. Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
- 4. Implement other air toxics-related communications and outreach programs
  - a. Continue to implement a diesel anti-idling educational program.
    - i. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
    - ii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
  - b. Actively promote the development and implementation of educational programs.
    - i. Continue working with the DVRPC on educational programs for Air Quality Partnership (AQP).
    - ii. Continue working with EPA Region 3 on educational programs for SmartWay Transport Programs.
    - iii. Provide guidance and assistance to DAQ's programs on development and implementation of educational and outreach programs, when needed.
  - c. Continue to participate in Claymont Coalition meetings.
  - d. Continue to improve compliance with Delaware's open burning requirements.
    - i. Continue to educate the public on Delaware's open burning restrictions.
    - ii. Continue to provide non-compliance prevention guidance for open burning activities.
    - iii. Approve, if appropriate, notifications submitted for open burning.
  - e. Modify the Area Source outreach/communication programs to incorporate needed changes or additions.
- 5. Continue to enhance the value and use of the air toxics information on DAQ's web sites.
  - a. Continue to provide pertinent and timely information to the public and regulated community on DAQ's web site during the adoption of new air toxics standards.
  - b. Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
  - c. Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
- 6. Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
  - a. Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/14, if required.
  - Coordinate the development and incorporation of new and newly revised standards into the Area Source Program –
    Implementation Plan as part of the Air Toxics Strategic Planning process.
  - c. Update the Area Source Program Implementation Plan by 10/14, if needed.
- 7. Adopt new and amend existing air toxics regulations for mobile and stationary sources.
  - a. Amend Regulation 1145 or adopt a new regulation to reduce excessive idling of non-road vehicles similar to the recently approved OTC model rule.
    - i. Complete promulgation by 3Q/14.
  - b. Adopt area standard applicable to Gasoline Distribution facilities (Federal Sub BBBBB).
    - i. Complete final stringency determinations by 3Q/14.
    - ii. Finalize the adoptions by 4Q/14.
    - iii. Publish final compliance assistance tools 4Q/14.
    - iv. Submit delegation package by 4Q/14.

#### **Year 2014**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 7. Adopt new and amend existing air toxics regulations for mobile and stationary sources.
  - c. Adopt RTR standards applicable to Secondary Aluminum Production facilities (Section 12.0) consistent with 2012 revisions to the federal rule (Federal Sub RRR).
    - i. Complete initial stringency determination between Federal Area Source Standard vs. existing Delaware regulations and finalize regulatory path forward, if necessary, by 3Q/14.
    - ii. Submit Start Action Notice by 3Q/14.
  - d. Revise existing and develop new control strategies, as needed.
    - i. Develop path forward for applicable area source air toxics and incinerator standards finalized in 2014.
    - ii. Develop path forward for residual risk standards applicable area sources finalized in 2014.
- 8. Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
- 9. Evaluate compliance to motor vehicle registration denials resulting from failed emissions tests (i.e. "parking lot" surveillance).
- 10. Continue to improve the inspection and maintenance (I/M) program reporting process.
- 11. Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
- 12. Continue to provide air toxics-related support to State through . . .
  - a. Reviewing of air permits.
  - b. Providing current regulatory interpretations.
  - c. Advising on likely future trends and actions.
  - d. Providing technical support, as needed.

#### **Year 2014**

### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

- 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

#### Year 2014

#### Air toxics resource development

- 1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- 2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
- 3. Continue to build a volunteer base in DAQ.
- 4. Continue to implement newly found mechanisms to improve air toxics communications between branches.

## 2015

#### **Year 2015**

#### Implement an on-going program to address the risks from exposure to air toxic

- 1. Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
  - a. Review status and complete year-end status report on the 2014 individual Strategic Plans.
  - b. Track implementation and report year-end-status of the 2014 Air Toxics Strategic Plan.
  - c. Review status and complete mid-year status report on the 2015 individual Strategic Plans.
  - d. Track implementation and report mid-year status on the 2015 Air Toxics Strategic Plan.
  - e. Continue to conduct GAP analyses within the risk-based strategic planning process and incorporate the results into the development of the 2016 Air Toxics Strategic Plan.
  - f. Updating of the Air Toxics Strategic Plan for 2016-2020
    - i. Review and revise, if needed, air toxics area source program and timing, as part of the 2016 Air Toxics Strategic Plan by 10/15.
    - ii. Review and revise, if needed, air toxics area source activities and timing as part of the 2016 Air Toxics Strategic Plan by 11/15.
    - iii. Coordinate development of the 2016 Air Toxics Strategic Plan.
    - iv. Update individual Strategic Plans for 2015-2019.
    - v. Update and finalize 2016 Air Toxics Strategic Plan for years 2016 to 2020.

#### Year 2015

#### Build greater understanding of ambient air toxics environment

- 1. Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - c. Continue to collaborate with University of Delaware on air toxics research and special projects.
  - d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - e. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab
  - f. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
  - g. Undertake new or special monitoring needs that may surface.
    - i. Undertake air toxics monitoring projects using the mobile monitoring platform where modeling results predict high concentrations or where the public has expressed concern.
- 2. Provide air toxics modeling support to meet community and internal needs.

#### **Year 2015**

#### **Identify potential harm from exposure to air toxics**

- 1. Identify the potential for unacceptable air toxics impacts.
  - a. Continue to provide modeling support to assist the DAQ's risk-based process, including providing screen modeled risk results based on monitoring or inventory information, as needed.
  - b. Using existing modeled results, identify candidate locations for air toxics monitoring using the mobile monitoring platform.
  - c. Continue to perform screen modeling to address potential air toxics risks during the permitting of new or modified stationary sources.
  - d. Coordinate DPH risk assessment support when DAQ's risk-based process activities identify potentially unacceptable air toxics impacts.
- 2. Continue to provide historical and projected emissions information in support of DAQ's air toxics modeling activities to identify unacceptable air toxics impacts.
- 3. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
  - a. Continue to provide modeling support to DAQ's special monitoring projects.
- 4. Provide modeling support to Engineering & Compliance (E&C) associated with risk-based permitting decisions, as needed.

#### **Year 2015**

#### Gather information related to air toxics sources

- 1. Develop and submit the 2014 NEI for HAPs by 12/31/15.
- 2. Continue to provide emissions inventory support to the air toxics education and reduction programs, as required.
- 3. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 4. By 12/15, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
- 5. By 12/15, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
- 6. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2015.
- 7. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

#### **Year 2015**

#### Identify options for reducing air toxics in the environment

- 1. Implement a risk-based process that identifies, assesses and mitigates unacceptable air toxics impacts.
  - a. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.
- 2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
- 3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to greenhouse gases, develop strategies, and identify DE solutions.
- 4. Continue working with the Transportation & Climate Initiative (TCI) to identify other Delaware appropriate options to reduce greenhouse gases and air toxics from the transportation sector.
- 5. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
  - b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
- 6. Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
- 7. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- 8. Identify and evaluate the risk reductions and funding needs of optional paths forward to reduce unacceptable public health risk from mobile source air toxics emissions based on evaluation of information available from DAQ monitoring or modeling projects, if appropriate.
- 9. Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 10. Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 11. Identify grant and funding opportunities.
  - a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - b. Identify funding to implement the 2014 selected Delaware appropriate transportation sector option(s). (To be determined)
- 12. Develop and implement Stage II decommissioning strategy for gasoline dispensing facilities.
- 13. Provide technical assistance on lightering operations to DAQ, as needed.

#### **Year 2015**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 1. Promote the implementation of mobile source diesel emission reduction projects.
  - a. Facilitate the implementation of diesel emission reduction projects.
  - b. Implement projects to reduce greenhouse gases and air toxics from the transportation sector.
    - i. For at least 1 of the Delaware appropriate transportation sector options identified in 2014, establish a path forward, if resources can be identified. (To be determined)
    - ii. Continue to facilitate the implementation of the selected Delaware appropriate transportation sector option(s), if resources can be identified. (To be determined)
  - c. Implement the "Smoking Vehicle Reduction Program".

#### **Year 2015**

Implement appropriate actions to reduce the harm from exposure to air toxics
1. Promote the implementation of mobile source diesel emission reduction projects.
d. Continue to support of the SmartWay Transport programs.
i. Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
2. Insure continued or improved compliance of stationary sources.
a. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better
address risk-based air toxics programs, as needed.
<ul> <li>Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk- based air toxics programs, as needed.</li> </ul>
c. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT
and residual risk standards) in accordance with the 2014-15 Compliance Monitoring Plan.
d. Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i. The 3 chrome plating facilities, subject to Reg. 1138 Section 6, covered during the 2014-15 timeframe.
ii. The 1 halogenated solvent degreaser, subject to Reg. 1138 Section 8, covered during the 2014-15 timeframe.
iii. The 1 hazardous waste combustor, subject to Federal Sub EEE, covered during the 2014-15 timeframe.
iv. The 3 municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2014-15 timeframe.
v. The 2 hospital ethylene oxide sterilization facilities, subject to Reg. 1138 Section 9, covered during the 2014-15 timeframe.
vi. The 1 lead acid battery manufacturing plant, subject to Reg. 1138 Section 11, covered during the 2014-15 timeframe.
vii. The 1 source, subject to electric arc furnace standard (Federal Sub YYYYY), covered during the 2014-15 timeframe.
viii. The 2 plating and polishing operations, subject to Reg. 1138 Section 10, covered during the 2014-15 timeframe.
ix. 40% or ~10 miscellaneous parts and products surface coating facilities, subject to Reg. 1138 Section 14, covered during
the 2014-15 timeframe; total potential population is ~25 facilities.
<ul> <li>The 1 asphalt processing and asphalt roofing products manufacturing operation, subject to Reg. 1138 Section 16, covered during the 2014-15 timeframe.</li> </ul>
xi. The 1 secondary aluminum production operation, subject to Reg. 1138 Section 12, covered during the 2014-15
timeframe.
xii. The 3 gasoline distribution operation, subject to Federal Sub BBBBBB, covered during the 2014-15 timeframe.
xiii. The 1 chemical manufacturing operation, subject to Federal Sub VVVVV, covered during the 2014-15 timeframe.
xiv. The 4 prepared feed operations, subject to Reg. 1138 Section 17, covered during the 2014-15 timeframe.
e. By 9/15, perform compliance evaluations (CE) at area air toxics sources as follows:
i. 50% or ~36 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~72 facilities.
ii. 50% or ~78 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15;
total population is ~157 facilities.
iii. 10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
f. Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
g. Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2015; total population is ~348 facilities.
h. Continue to implement the Asbestos Demolition/Renovation Program.
i. Perform site inspections at asbestos demolition/renovation sites.
ii. Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
<ul> <li>iii. Educate the public, certified contractors, professional service firms, and government agencies on the proper removal and disposal of asbestos.</li> </ul>
iv. Respond to incidences of improper disposal of asbestos containing wastes.

#### **Year 2015**

<u> </u>	uı	2013		
	Implement appropriate actions to reduce the harm from exposure to air toxics			
2.	Ins	ure continued or improved compliance of stationary sources.		
	i. Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.			
	j. Incorporate updated MACT and Residual Risk requirements in air permits.			
		i. Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.		
		<ol> <li>Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation 1130, as needed.</li> </ol>		
		iii. Incorporate area source standard requirements into natural and synthetic minor source permits, including		
		1. All new installations that are subject to area source standards in Reg. 1138.		
		<ol> <li>All existing miscellaneous parts and products manufacturing facilities determined to be subject to the paint stripping requirements in Reg. 1138 Section 13 and/or the surface coating requirements in Reg. 1138 Section 14.</li> </ol>		
		<ol> <li>All existing facilities subject to gasoline distribution requirements of Reg. 1138 Section 18 (Federal Sub BBBBBB).</li> </ol>		
	k.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for		
		i. New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
		ii. Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
		iii. New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
		iv. Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
	1.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.		
	m.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for		
		i. Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
		ii. Sources subject to the Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
3.	Im	plement control measures to mitigate unacceptable air toxics impacts, if identified.		
	a.	If DAQ identifies a local area or condition that results in unacceptable risk that is specific to a stationary source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.		
	b.	If DAQ identifies a local area or condition that results in unacceptable risk that is specific to an area source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.		
	c.	If DAQ identifies a local area or condition that results in unacceptable risk that needs to be addressed through a regulatory action, identify and convene the appropriate stakeholders to develop an appropriate regulatory path forward to address the unacceptable risk.		
	d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.		
4.	Im	plement other air toxics-related communications and outreach programs		
	a.	Continue to implement a diesel anti-idling educational program.		
		i. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.		
		ii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.		
	b.	Actively promote the development and implementation of educational programs.		
		i. Continue working with the DVRPC on educational programs for Air Quality Partnership (AQP).		
		ii. Continue working with EPA Region 3 on educational programs for SmartWay Transport Programs.		
		iii. Provide guidance and assistance to DAQ's programs on development and implementation of educational and outreach programs, when needed.		
	c.	Continue to participate in Claymont Coalition meetings.		

#### **Year 2015**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 4. Implement other air toxics-related communications and outreach programs
  - d. Continue to improve compliance with Delaware's open burning requirements.
    - i. Continue to educate the public on Delaware's open burning restrictions.
    - ii. Continue to provide non-compliance prevention guidance for open burning activities.
    - iii. Approve, if appropriate, notifications submitted for open burning.
  - e. Modify the Area Source outreach/communication programs to incorporate needed changes or additions.
- 5. Continue to enhance the value and use of the air toxics information on DAQ's web sites.
  - a. Continue to provide pertinent and timely information to the public and regulated community on DAQ's web site during the adoption of new air toxics standards.
  - b. Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
  - c. Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
- 6. Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
  - a. Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/15, if required.
  - Coordinate the development and incorporation of new and newly revised standards into the Area Source Program –
     Implementation Plan as part of the Air Toxics Strategic Planning process.
  - c. Update the Area Source Program Implementation Plan by 10/15, if needed.
- 7. Adopt new and amend existing air toxics regulations for mobile and stationary sources.
  - a. Adopt a new regulation to reduce excessive emission from motor vehicles similar to the recently approved OTC model rule on aftermarket catalytic converters. (To be determined)
  - b. Amend Regulation 1131 or adopt a new regulation to reduce emissions from medium and heavy-duty diesel engines and equipment similar to the recently approved OTC model rule providing diesel inspection and maintenance program requirements. (To be determined).
  - c. Adopt RTR standards applicable to Secondary Aluminum Production facilities (Section 12.0) consistent with 2012 revisions to the federal rule (Federal Sub RRR).
    - i. Complete final stringency determinations by 3Q/15.
    - ii. Finalize the adoption by 3Q/15.
    - iii. Publish final compliance assistance tools 3Q/15.
    - iv. Submit delegation package addendum by 4Q/15.
  - d. Adopt area standard applicable to Gasoline Dispensing facilities (Federal Sub CCCCCC).
    - i. Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware Regulation 1124 and finalize regulatory path forward in terms of applicable Regulation (1124 vs. 1138) by 3Q/15.
    - ii. Submit Start Action Notice by 3Q/15.
  - e. Revise existing and develop new control strategies, as needed.
    - i. Develop path forward for applicable area source air toxics and incinerator standards finalized in 2015.
    - ii. Develop path forward for residual risk standards applicable area sources finalized in 2015.
- 8. Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
- 9. Evaluate compliance to motor vehicle registration denials resulting from failed emissions tests (i.e. "parking lot" surveillance).
- 10. Continue to improve the inspection and maintenance (I/M) program reporting process.
- 11. Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
- 12. Implement the resource-effective alternative procedures, if they are found to be an acceptable replacement for the current "parking lot" surveillance element of the inspection and maintenance (I/M) program.

#### Year 2015

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 13. Continue to provide air toxics-related support to State through . . .
  - a. Reviewing of air permits.
  - b. Providing current regulatory interpretations.
  - c. Advising on likely future trends and actions.
  - d. Providing technical support, as needed.

#### **Year 2015**

### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

- 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

#### **Year 2015**

#### Air toxics resource development

- 1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- 2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
- 3. Continue to build a volunteer base in the DAQ.
- 4. Continue to implement newly found mechanisms to improve air toxics communications between branches.

## 2016

#### **Year 2016**

#### Implement an on-going program to address the risks from exposure to air toxic

- 1. Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
  - a. Review status and complete year-end status report on the 2015 individual Strategic Plans.
  - b. Track implementation and report year-end-status of the 2015 Air Toxics Strategic Plan.
  - c. Review status and complete mid-year status report on the 2016 individual Strategic Plans.
  - d. Track implementation and report mid-year status on the 2016 Air Toxics Strategic Plan.
  - e. Continue to conduct GAP analyses within the risk-based strategic planning process and incorporate the results into the development of the 2017 Air Toxics Strategic Plan.
  - f. Updating of the Air Toxics Strategic Plan for 2017-2021
    - i. Review and revise, if needed, air toxics area source program and timing, as part of the 2017 Air Toxics Strategic Plan by 10/16.
    - ii. Review and revise, if needed, air toxics area source activities and timing as part of the 2017 Air Toxics Strategic Plan by 11/16.
    - iii. Coordinate development of the 2017 Air Toxics Strategic Plan.
    - iv. Update individual Strategic Plans for 2017-2021.
    - v. Update and finalize 2017 Air Toxics Strategic Plan for years 2017 to 2021.

#### **Year 2016**

#### Build greater understanding of ambient air toxics environment

- 1. Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - c. Continue to collaborate with University of Delaware on air toxics research and special projects.
  - d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - e. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
  - f. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
  - g. Undertake new or special monitoring needs that may surface.
    - i. Undertake air toxics monitoring projects using the mobile monitoring platform where modeling results predict high concentrations or where the public has expressed concern.
- 2. Provide air toxics modeling support to meet community and internal needs.

#### **Year 2016**

#### Identify potential harm from exposure to air toxics

- 1. Identify the potential for unacceptable air toxics impacts.
  - a. Using existing modeled results, identify candidate locations for air toxics monitoring using the mobile monitoring platform.
  - b. Continue to provide modeling support to assist the DAQ's risk-based process, including providing screen modeled risk results based on monitoring or inventory information, as needed.
  - c. Continue to perform screen modeling to address potential air toxics risks during the permitting of new or modified stationary sources.
  - d. Coordinate DPH risk assessment support when DAQ's risk-based process activities identify potentially unacceptable air toxics impacts.
- 2. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
  - a. Continue to provide modeling support to DAQ's special monitoring projects.
- 3. Continue to provide historical and projected emissions information in support of DAQ's air toxics modeling activities to identify unacceptable air toxics impacts.
- 4. Provide modeling support to Engineering & Compliance (E&C) associated with risk-based permitting decisions, as needed.

#### **Year 2016**

#### Gather information related to air toxics sources

- 1. Continue to provide emissions inventory support to the air toxics education and reduction programs, as required.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By 12/16, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
- 4. By 12/16, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
- 5. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2016.
- 6. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

#### **Year 2016**

#### Identify options for reducing air toxics in the environment

- 1. Implement a risk-based process that identifies, assesses and mitigates unacceptable air toxics impacts.
  - a. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.
- 2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
- 3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to greenhouse gases, develop strategies, and identify DE solutions.
- 4. Continue working with the Transportation & Climate Initiative (TCI) to identify other Delaware appropriate options to reduce greenhouse gases and air toxics from the transportation sector.
- 5. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
  - b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.

#### **Year 2016**

#### Identify options for reducing air toxics in the environment

- 6. Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
- 7. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- 8. Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 9. Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 10. Identify grant and funding opportunities.
  - a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - b. For at least 1 of the Delaware appropriate transportation sector options previously identified, establish a path forward, if resources can be identified. (To be determined)
  - **c.** Identify and evaluate the risk reductions and funding needs of optional paths forward to reduce unacceptable public health risk from mobile source air toxics emissions based on evaluation of information available from DAQ monitoring or modeling projects, if appropriate.
- 11. Develop and implement Stage II decommissioning strategy for gasoline dispensing facilities.
- 12. Provide technical assistance on lightering operations to DAQ, as needed.

#### **Year 2016**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 1. Promote the implementation of mobile source air toxics reduction initiatives/programs.
  - a. Facilitate the implementation of diesel emission reduction projects.
  - b. Continue to support of the SmartWay Transport programs.
    - i. Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
    - ii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
  - c. Implement projects to reduce greenhouse gases and air toxics from the transportation sector.
    - i. For at least 1 of the Delaware appropriate transportation sector options previously identified, establish a path forward, if resources can be identified. (To be determined)
    - ii. Continue to facilitate the implementation of the selected Delaware appropriate transportation sector option(s), if resources can be identified. (To be determined)
- 2. Insure continued or improved compliance of stationary sources.
  - a. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
  - b. Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.
  - c. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the 2016-17 Compliance Monitoring Plan.

#### **Year 2016**

		Identify options for reducing air toxics in the environment	
2.	Insure continued or improved compliance of stationary sources.		
	d. Per	form full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:	
	i.	The 3 chrome plating facilities, subject to Reg. 1138 Section 6, covered during the 2016-17 timeframe.	
	ii.	The 1 halogenated solvent degreaser, subject to Reg. 1138 Section 8, covered during the 2016-17 timeframe.	
	iii.	The 1 hazardous waste combustor, subject to Federal Sub EEE, covered during the 2016-17 timeframe.	
	iv.	The 3 municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2016-17 timeframe.	
	V.	The 2 hospital ethylene oxide sterilization facilities, subject to Reg. 1138 Section 9, covered during the 2016-17 timeframe.	
	vi.	The 1 lead acid battery manufacturing plant, subject to Reg. 1138 Section 11, covered during the 2016-17 timeframe.	
	vii.	The 1 source, subject to electric arc furnace standard (Federal Sub YYYYY), covered during the 2016-17 timeframe.	
	viii.	The 2 plating and polishing operations, subject to Reg. 1138 Section 10, covered during the 2016-17 timeframe.	
	ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to Reg. 1138 Section 14, covered during the 2016-17 timeframe; total potential population is ~25 facilities.	
	х.	The 1 asphalt processing and asphalt roofing products manufacturing operation, subject to Reg. 1138 Section 16, covered during the 2016-17 timeframe.	
	xi.	The 1 secondary aluminum production operation, subject to Reg. 1138 Section 12, covered during the 2016-17 timeframe.	
	xii.	The 1 chemical manufacturing operation, subject to Federal Sub VVVVV, covered during the 2016-17 timeframe.	
	xiii.	The 5 prepared feed operations, subject to Reg. 1138 Section 17, covered during the 2016-17 timeframe.	
	xiv.	The 3 gasoline distribution facilities, subject to Reg. 1138 Section 18, covered during the 2016-17 timeframe.	
	e. By	9/16, perform compliance evaluations (CE) at area air toxics sources as follows:	
	i.	50% or ~36 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~72 facilities.	
	ii.	50% or ~78 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~157 facilities.	
	iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.	
	rec	ack annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing uirements of Regulation 1124.	
		nduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 16; total population is ~348 facilities.	
	h. Co	ntinue to implement the Asbestos Demolition/Renovation Program.	
	i.	Perform site inspections at asbestos demolition/renovation sites.	
		Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).	
	iii.	Educate the public, certified contractors, professional service firms, and government agencies on the proper removal and disposal of asbestos.	
	iv.	Respond to incidences of improper disposal of asbestos containing wastes.	
	i. Ta	ke enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.	
	j. Inc	orporate updated MACT and Residual Risk requirements in air permits.	
	i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.	
	ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation 1130, as needed.	

#### **Year 2016**

<u>Year 2016</u>	
Implement appropriate actions to reduce the harm from exposure to air toxics	
2. Insure continued or improved compliance of stationary sources.	
k. Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for	
i. All new installations that are subject to area source standards in Reg. 1138.	
ii. All existing miscellaneous parts and products manufacturing facilities determined to be subject to the paint stripping	
requirements in Reg. 1138 Section 13 and/or the surface coating requirements in Reg. 1138 Section 14.	
iii. All existing secondary aluminum production operations subject to the requirements of Reg. 1138 Section 12.	
iv. New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
v. Unpermitted existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
vi. New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	-
vii. Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 S 15).	ect
l. Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.	
m. Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for	
i. Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	
ii. Sources subject to the Perchloroethylene Dry Cleaning standard (1138 Sect 5).	
3. Implement control measures to mitigate unacceptable air toxics impacts, if identified.	
a. If DAQ identifies a local area or condition that results in unacceptable risk that is specific to a stationary source or source	
identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the	ie
unacceptable risk.  b. If DAQ identifies a local area or condition that results in unacceptable risk that is specific to an area source or sources,	
identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the	ne
unacceptable risk.	
c. If DAQ identifies a local area or condition that results in unacceptable risk that needs to be addressed through a regulatory	
action, identify and convene the appropriate stakeholders to develop an appropriate regulatory path forward to address the	;
unacceptable risk.  d. Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found	
	1.
4. Implement other air toxics-related communications and outreach programs  Continue to implement a dissellentialling educational program.	
a. Continue to implement a diesel anti-idling educational program.	
i. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.	
ii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.	
b. Actively promote the development and implementation of educational programs.	
i. Continue working with the DVRPC on educational programs for Air Quality Partnership (AQP).	
ii. Continue working with EPA Region 3 on educational programs for SmartWay Transport Programs.	
<ul> <li>Provide guidance and assistance to DAQ's programs on development and implementation of educational and outreac programs, when needed.</li> </ul>	n
c. Continue to participate in Claymont Coalition meetings.	
d. Continue to improve compliance with Delaware's open burning requirements.	
i. Continue to educate the public on Delaware's open burning restrictions.	
ii. Continue to provide non-compliance prevention guidance for open burning activities.	
iii. Approve, if appropriate, notifications submitted for open burning.	

g. Modify the Area Source outreach/communication programs to incorporate needed changes or additions.

#### **Year 2016**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 5. Continue to enhance the value and use of the air toxics information on DAQ's web sites.
  - a. Continue to provide pertinent and timely information to the public and regulated community on DAQ's web site during the adoption of new air toxics standards.
  - b. Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
  - c. Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
- 6. Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
  - a. Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/16, if required.
  - b. Coordinate the development and incorporation of new and newly revised standards into the Area Source Program Implementation Plan as part of the Air Toxics Strategic Planning process.
  - c. Update the Area Source Program Implementation Plan by 10/16, if needed.
- 7. Implement Air Toxics Area Source Program
  - a. Adopt area standard applicable to Gasoline Dispensing facilities (Federal Sub CCCCC).
    - i. Complete final stringency determinations by 2Q/16.
    - ii. Finalize the adoption by 3Q/16.
    - iii. Publish final compliance assistance tools 3Q/16.
    - iv. Submit delegation package by 3Q/16.
  - b. Adopt area standard applicable to ICI Boilers (Federal Sub JJJJJJ).
    - i. Complete initial stringency determination between Federal Area Source Standard vs. existing Delaware regulations and finalize regulatory path forward, if necessary, by 2Q/16.
    - ii. Submit Start Action Notice by 3Q/16.
  - c. Revise existing and develop new control strategies, as needed.
    - i. Develop path forward for applicable area source air toxics and incinerator standards finalized in 2016.
    - ii. Develop path forward for residual risk standards applicable area sources finalized in 2016.
- 8. Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
- 9. Evaluate compliance to motor vehicle registration denial in response to failed emissions tests.
- 10. Continue to improve the inspection and maintenance (I/M) program reporting process.
- 11. Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
- 12. Continue to provide air toxics-related support to State through . .
  - a. Reviewing of air permits.
  - b. Providing current regulatory interpretations.
  - c. Advising on likely future trends and actions.
  - d. Providing technical support, as needed.

#### **Year 2016**

### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

- 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

#### **Year 2016**

#### Air toxics resource development

- 1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
- 3. Continue to build a volunteer base in DAQ.
- 4. Continue to implement newly found mechanisms to improve air toxics communications between branches.

## 2017

#### **Year 2017**

#### Implement an on-going program to address the risks from exposure to air toxic

- . Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
  - a. Review status and complete year-end status report on the 2016 individual Strategic Plans.
  - b. Track implementation and report year-end-status of the 2016 Air Toxics Strategic Plan.
  - c. Review status and complete mid-year status report on the 2017 individual Strategic Plans.
  - d. Track implementation and report mid-year status on the 2017 Air Toxics Strategic Plan.
  - e. Continue to conduct GAP analyses within the risk-based strategic planning process and incorporate the results into the development of the 2018 Air Toxics Strategic Plan.
  - f. Updating of the Air Toxics Strategic Plan for 2018-2022
    - i. Review and revise, if needed, air toxics area source program and timing, as part of the 2018 Air Toxics Strategic Plan by 10/17.
    - ii. Review and revise, if needed, air toxics area source activities and timing as part of the 2018 Air Toxics Strategic Plan by 12/17.
    - iii. Coordinate development of the 2018 Air Toxics Strategic Plan.
    - iv. Update individual Strategic Plans for 2018-2022.
    - v. Update and finalize 2018 Air Toxics Strategic Plan for years 2018 to 2022.

#### **Year 2017**

#### Build greater understanding of ambient air toxics environment

- 1. Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - c. Continue to collaborate with University of Delaware on air toxics research and special projects.
  - d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - e. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
  - f. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
  - g. Undertake new or special monitoring needs that may surface.
    - i. Undertake air toxics monitoring projects using the mobile monitoring platform where modeling results predict high concentrations or where the public has expressed concern.
- 2. Provide air toxics modeling support to meet community and internal needs.

#### **Year 2017**

#### Identify potential harm from exposure to air toxics

- 1. Identify the potential for unacceptable air toxics impacts.
  - a. Using existing modeled results, identify candidate locations for air toxics monitoring using the mobile monitoring platform.
  - b. Continue to provide modeling support to assist the DAQ's risk-based process, including providing screen modeled risk results based on monitoring or inventory information, as needed.
  - c. Continue to perform screen modeling to address potential air toxics risks during the permitting of new or modified stationary sources.
  - d. Coordinate DPH risk assessment support when DAQ's risk-based process activities identify potentially unacceptable air toxics impacts.
- 2. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
  - a. Continue to provide modeling support to DAQ's special monitoring projects.
- 3. Continue to provide historical and projected emissions information in support of DAQ's air toxics modeling activities to identify unacceptable air toxics impacts.
- 4. Provide modeling support to Engineering & Compliance (E&C) associated with risk-based permitting decisions, as needed.

#### **Year 2017**

#### Gather information related to air toxics sources

- 1. Develop emissions inventory protocol for the implementation of the 2017 NEI, if needed.
- 2. Continue to provide emissions inventory support to the air toxics education and reduction programs, as required.
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 4. By 12/17, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
- By 12/17, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
- 6. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2017.
- 7. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

#### **Year 2017**

#### Identify options for reducing air toxics in the environment

- 1. Implement a risk-based process that identifies, assesses and mitigates unacceptable air toxics impacts.
  - a. Participate in DAQ's risk-based process to identify, assess, and mitigate local areas or conditions of unacceptable air toxics impacts.
- 2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
- 3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to greenhouse gases, develop strategies, and identify DE solutions.
- 4. Continue working with the Transportation & Climate Initiative (TCI) to identify other Delaware appropriate options to reduce greenhouse gases and air toxics from the transportation sector.
- 5. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
  - b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.

#### Year 2017

#### Identify options for reducing air toxics in the environment

- 6. Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
- 7. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 9. Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
  - a. Newly proposed amendments to federal air toxics and incinerator standards.
  - b. Newly proposed federal residual risk standards.
- 10. Identify grant and funding opportunities.
  - a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - b. Identify funding to implement the selected Delaware appropriate transportation sector option(s). (To be determined)
- 11. Provide technical assistance on lightering operations to DAQ, as needed.

#### **Year 2017**

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 1. Promote the implementation of mobile source diesel emission reduction projects.
  - a. Facilitate the implementation of diesel emission reduction projects.
  - b. Continue to support of the SmartWay Transport programs.
    - i. Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
    - ii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
  - c. Implement projects to reduce greenhouse gases and air toxics from the transportation sector.
    - i. For at least 1 of the Delaware appropriate transportation sector options previously identified, establish a path forward, if resources can be identified. (To be determined)
    - ii. Continue to facilitate the implementation of the selected Delaware appropriate transportation sector option(s), if resources can be identified. (To be determined)
- 2. Insure continued or improved compliance of stationary sources.
  - a. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
  - b. Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.
  - c. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the 2016-17 Compliance Monitoring Plan.

#### **Year 2017**

	Implement app	ropriate actions to reduce the harm from exposure to air toxics	
2.	Insure continued or improved compliance of stationary sources.		
	d. Perform full complian	ce evaluations (FCEs) of facilities subject to area source air toxics standards as follows:	
	i. The 3 chrome pla	ting facilities, subject to Reg. 1138 Section 6, covered during the 2016-17 timeframe.	
	ii. The 1 halogenated	I solvent degreaser, subject to Reg. 1138 Section 8, covered during the 2016-17 timeframe.	
	iii. The 1 hazardous v	waste combustor, subject to Federal Sub EEE, covered during the 2016-17 timeframe.	
	iv. The 3 municipal s	olid waste landfills, subject to Federal Sub AAAA, covered during the 2016-17 timeframe.	
	v. The 2 hospital eth timeframe.	ylene oxide sterilization facilities, subject to Reg. 1138 Section 9, covered during the 2016-17	
	vi. The 1 lead acid ba	attery manufacturing plant, subject to Reg. 1138 Section 11, covered during the 2016-17 timeframe.	
	vii. The 1 source, sub	ect to electric arc furnace standard (Federal Sub YYYYY), covered during the 2016-17 timeframe.	
	viii. The 2 plating and	polishing operations, subject to Reg. 1138 Section 10, covered during the 2016-17 timeframe.	
		ellaneous parts and products surface coating facilities, subject to Reg. 1138 Section 14, covered during frame; total potential population is ~25 facilities.	
	covered during th	cessing and asphalt roofing products manufacturing operation, subject to Reg. 1138 Section 16, e 2016-17 timeframe.	
	xi. The 1 secondary a timeframe.	lluminum production operation, subject to Reg. 1138 Section 12, covered during the 2016-17	
	xii. The 1 chemical m	anufacturing operation, subject to Federal Sub VVVVVV, covered during the 2016-17 timeframe.	
	xiii. The 4 prepared fe	ed operations, subject to Reg. 1138 Section 17, covered during the 2016-17 timeframe.	
	xiv. The 3 gasoline dis	stribution facilities, subject to Reg. 1138 Section 18, covered during the 2016-17 timeframe.	
	e. By 9/17, perform com	pliance evaluations (CE) at area air toxics sources as follows:	
	i. 50% or ~36 perch	loroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~72 facilities.	
	ii. 50% or ~78 moto total population is	vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; ~157 facilities.	
	iii. 10% or ~60 gasol	ine delivery vessels; total population is ~600 facilities.	
	f. Track annual testing or requirements of Regul	f Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing ation 1124.	
	<ul><li>g. Conduct inspections a 2016; total population</li></ul>	t one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during is ~348 facilities.	
	h. Continue to implemen	t the Asbestos Demolition/Renovation Program.	
	i. Perform site inspe	ections at asbestos demolition/renovation sites.	
	ii. Monitor and main	tain the Delaware Online Asbestos Notification System (DOANS).	
	iii. Educate the publicand disposal of as	e, certified contractors, professional service firms, and government agencies on the proper removal bestos.	
	iv. Respond to incide	nces of improper disposal of asbestos containing wastes.	
	i. Take enforcement aga	inst gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.	
	j. Continue to implemen	t Stage II decommissioning strategy for gasoline dispensing facilities.	
	k. Incorporate updated N	IACT and Residual Risk requirements in air permits.	
	i. Renew expiring T	itle V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.	
		ermits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the egulation 1130, as needed.	

#### **Year 2017**

Ye	<u>Year 2017</u>			
		Implement appropriate actions to reduce the harm from exposure to air toxics		
2.	Ins	ure continued or improved compliance of stationary sources.		
	1.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for		
		i. All new installations that are subject to area source standards in Reg. 1138.		
		ii. All existing miscellaneous parts and products manufacturing facilities determined to be subject to the paint stripping requirements in Reg. 1138 Section 13 and/or the surface coating requirements in Reg. 1138 Section 14.		
		iii. New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
		iv. Unpermitted existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
		v. New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
		vi. Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
	m.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.		
	n.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for		
		i. Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).		
		ii. Sources subject to the Perchloroethylene Dry Cleaning standard (1138 Sect 5).		
3.	Imj	plement control measures to mitigate unacceptable air toxics impacts, if identified.		
	a.	If DAQ identifies a local area or condition that results in unacceptable risk that is specific to a stationary source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.		
	b.	If DAQ identifies a local area or condition that results in unacceptable risk that is specific to an area source or sources, identify and convene the appropriate stakeholders to develop an appropriate control technology path forward to address the unacceptable risk.		
	c.	If DAQ identifies a local area or condition that results in unacceptable risk that needs to be addressed through a regulatory action, identify and convene the appropriate stakeholders to develop an appropriate regulatory path forward to address the unacceptable risk.		
	d.	Begin implementation of preferred paths forward to reduce unacceptable risk from mobile source air toxics based on evaluation of information available from DAQ monitoring or modeling projects, when funding is obtained.		
	e.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.		
4.	Im	plement other air toxics-related communications and outreach programs		
	a.	Continue to implement a diesel anti-idling educational program.		
		i. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.		
		ii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.		
	b.	Actively promote the development and implementation of educational programs.		
		i. Continue working with the DVRPC on educational programs for Air Quality Partnership (AQP).		
		ii. Continue working with EPA Region 3 on educational programs for SmartWay Transport Programs.		
		iii. Provide guidance and assistance to DAQ's programs on development and implementation of educational and outreach programs, when needed.		
	c.	Continue to participate in Claymont Coalition meetings.		
	d.	Continue to improve compliance with Delaware's open burning requirements.		
		i. Continue to educate the public on Delaware's open burning restrictions.		
		ii. Continue to provide non-compliance prevention guidance for open burning activities.		
		iii. Approve, if appropriate, notifications submitted for open burning.		
<b> </b>				

e. Modify the Area Source outreach/communication programs to incorporate needed changes or additions.

#### Year 2017

#### Implement appropriate actions to reduce the harm from exposure to air toxics

- 5. Continue to enhance the value and use of the air toxics information on DAQ's web sites.
  - a. Continue to provide pertinent and timely information to the public and regulated community on DAQ's web site during the adoption of new air toxics standards.
  - b. Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
  - c. Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
- 6. Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
  - a. Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/17, if required.
  - b. Coordinate the development and incorporation of new and newly revised standards into the Area Source Program Implementation Plan as part of the Air Toxics Strategic Planning process.
  - c. Update the Area Source Program Implementation Plan by 10/17, if needed.
- 7. Implement Air Toxics Area Source Program
  - a. Adopt area standard applicable to ICI Boilers (Federal Sub JJJJJJ).
    - i. Complete final stringency determinations by 3Q/17.
    - ii. Finalize the adoption by 3Q/17.
    - iii. Publish final compliance assistance tools 3Q/17.
    - iv. Submit delegation package by 4Q/17.
  - b. Amend infrastructure standard, Section 3 of Regulation 1138 for appropriate revisions to the Federal General Provisions (Federal Sub A), if initial stringency determinations were completed.
    - i. Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and finalize regulatory path forward, if necessary, by 3Q/17.
    - ii. Submit Start Action Notice by 3Q/17.
  - c. Revise existing and develop new control strategies, as needed.
    - i. Develop path forward for applicable area source air toxics and incinerator standards finalized in 2017.
    - ii. Develop path forward for residual risk standards applicable area sources finalized in 2017.
- 8. Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
- 9. Evaluate compliance to motor vehicle registration denial in response to failed emissions tests.
- 10. Continue to improve the inspection and maintenance (I/M) program reporting process.
- 11. Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
- 12. Continue to provide air toxics-related support to State through . . .
  - a. Reviewing of air permits.
  - b. Providing current regulatory interpretations.
  - c. Advising on likely future trends and actions.
  - d. Providing technical support, as needed.

#### Year 2017

### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

- 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics, as needed.
- 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

#### **Year 2017**

#### Air toxics resource development

- 1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- 2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
- 3. Continue to build a volunteer base in DAO.
- 4. Continue to implement newly found mechanisms to improve air toxics communications between branches.